

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
TRUNG NGUYEN,)
Defendant)
Criminal No. 23-cr-10148-RGS

STIPULATIONS

The parties agree as follows:

1. Exhibits 6 through 9B consist of authentic business records of Kraken within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
 2. Exhibits 51 through 71A are accurate and authentic copies of electronic data extracted from a Lenovo Think Centre computer recovered from Vioclean's offices in Swampscott, Massachusetts on or about January 7, 2021. The data, including the data depicted in Exhibits 51 through 71A was extracted using an electronic process that produces accurate results and that does not alter the data. Exhibits 51 through 71A are admissible in evidence.
 3. Exhibit 74 consists of authentic business records of Genesis Global Trading, Inc. within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
 4. Exhibits 75 through 79 consist of authentic business records of BitAML within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
 5. Exhibits 84-86 consist of authentic business records of Bank of America within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
 6. Exhibits 87 through 88 consist of authentic business records of Google within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.

7. Exhibit 89 consists of authentic business records of RTN Credit Union within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
8. Exhibits 90 through 91 consist of authentic business records of Santander Bank within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
9. Exhibits 92 through 102 consist of authentic business records of TD Bank within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of the records.
10. The business Digital Assets LLC did not have any bank accounts between September 2017 and October 2020.
11. Exhibit 106 consists of authentic business records of Paxful within the meaning of Federal Rules of Evidence 803(6), 901, and 902(11) and are admissible in evidence without the testimony of a keeper of records.
12. Exhibits 107 through 109 consist of authentic business records of LocalBitcoins within the meaning of Federal Rules of Evidence 803(6), 901 and 902(11) and are admissible in evidence without the testimony of a keeper of records.

Respectfully Submitted,

JOSHUA S. LEVY
ACTING US ATTORNEY

By: /s/ Benjamin A. Saltzman
Seth B. Kosto
Benjamin A. Saltzman
Assistant United States Attorney
U.S. Attorney's Office
One Courthouse Way
Boston, MA 02210

By: /s/ Bradford Eliot Keene
Bradford Eliot Keene
7 Kimball Lane, Suite B
Lynnfield, MA 01940

Certificate of Service

I, Benjamin A. Saltzman, hereby certify that this document was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”).

Date: November 3, 2024

/s/ Benjamin A. Saltzman
Benjamin A. Saltzman